

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VERONICA SHIRLEY, *individually and on
behalf of all others similarly situated,*

Plaintiff,

- against -

REYNOLDS CONSUMER PRODUCTS
LLC,

Defendant.

No. 1:22-cv-00278

Judge: Honorable Elaine E. Bucklo

JOINT STATUS REPORT

Pursuant to the Court's Minute Entry of May 21, 2024, ECF No. 75, Plaintiff Veronica Shirley ("Plaintiff" or "Shirley") and Defendant Reynolds Consumer Products LLC ("Defendant" or "Reynolds") (together, the "Parties") respectfully submit this Joint Status Report proposing dates for the remaining deadlines for the case schedule.

The remaining deadlines set in the Minute Entry of May 21, 2024, are as follows:

Opposition to class certification and Reynolds' rebuttal class certification expert report(s) due	10/21/2024
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Reply in support of class certification and Shirley's reply class certification expert report(s) due	11/21/2024
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Ruling before Honorable Elaine E. Bucklo	12/20/2024 at 9:30 a.m.
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In addition, Reynolds intends to file a motion for summary judgment as to Plaintiff's individual claims within about 14-21 days. The Parties also note that, if the Court grants Plaintiff's motion for class certification, notice under Rule 23 would need to be addressed.

The Parties jointly propose the following schedule:

<u>Event</u>	<u>Deadline</u>
Parties to submit proposal of class notice, if any, and pretrial and trial deadlines	60 days after service of court's class certification ruling
Completion of Fact Discovery	May 5, 2025
Merits Expert Reports	June 16, 2025
Rebuttal Expert Reports	August 15, 2025
Summary Judgment (as to claims certified, if any) and <i>Daubert</i> Motions	September 15, 2025
Summary Judgment and <i>Daubert</i> Responses	October 15, 2025
Summary Judgment and <i>Daubert</i> Replies	November 14, 2025

* If the Court grants Plaintiff's motion for class certification, the parties will confer and endeavor to reach agreement on the notice program, as well as a pretrial schedule. To the extent the motion for approval of the notice program is not agreed upon in any respect, the Parties will propose an agreed briefing schedule to the Court for briefing any disagreement. The length and scope of any trial will vary significantly based on any class certification decision, so the Parties propose to submit a trial proposal after the Court's class certification decision.

Respectfully submitted,

Date: September 20, 2024

REESE LLP

By: /s/ George V. Granade

George V. Granade
ggranade@reesellp.com
 8484 Wilshire Boulevard, Suite 515
 Los Angeles, California 90211
 Telephone: (310) 393-0070

REESE LLP

Michael R. Reese
mreese@reesellp.com
 100 West 93rd Street, 16th Floor
 New York, New York 10025
 Telephone: (212) 643-0500

BAILEY & GLASSER LLP

Elizabeth A. Ryan (admitted *pro hac vice*)
eryan@baileyglasser.com
 176 Federal Street, 5th Floor
 Boston, Massachusetts 02110
 Telephone: (617) 439-6730

SHEEHAN & ASSOCIATES, P.C.

Spencer Sheehan

spencer@spencersheehan.com

60 Cuttermill Road, Suite 409

Great Neck, New York 11021

Telephone: (516) 268-7080

*Counsel for Plaintiff Veronica Shirley and the
Proposed Class*

Date: September 20, 2024

GREENBERG TRAURIG, LLP

By: /s/ David S. Repking (with permission)

David S. Repking

repkingd@gtlaw.com

Jonathan H. Claydon

claydonj@gtlaw.com

77 West Wacker Drive, Suite 3100

Chicago, Illinois 60601

Telephone: (312) 456-8400

*Counsel for Defendant Reynolds Consumer
Products LLC*